

 ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMERICAN BROADCASTING
COMPANIES, INC., DISNEY
ENTERPRISES, INC., TWENTIETH
CENTURY FOX FILM CORPORATION,
CBS BROADCASTING INC., CBS STUDIOS
INC., FOX TELEVISION STATIONS, LLC,
FOX BROADCASTING COMPANY, LLC,
NBCUNIVERSAL MEDIA, LLC,
UNIVERSAL TELEVISION LLC, and OPEN
4 BUSINESS PRODUCTIONS, LLC,

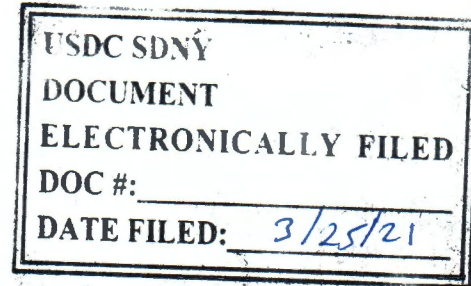
Plaintiffs,

v.

DAVID R. GOODFRIEND and SPORTS
FANS COALITION NY, INC.,

Defendants.

No. 19-cv-7136 (LLS)



**SIXTH JOINT STIPULATION AND [PROPOSED] ORDER
MODIFYING CASE SCHEDULING ORDER**

Plaintiffs American Broadcasting Companies, Inc., Disney Enterprises, Inc., Twentieth Century Fox Film Corporation, CBS Broadcasting Inc., CBS Studios Inc., Fox Television Stations, LLC, Fox Broadcasting Company, LLC, NBCUniversal Media, LLC, Universal Television LLC, and Open 4 Business Productions, LLC (“Plaintiffs”), and Defendants David R. Goodfriend and Sports Fans Coalition NY, Inc. (“Defendants”), by and through their counsel, respectfully submit this Sixth Joint Stipulation and Proposed Order Modifying the Scheduling Order in the above-captioned matter.

On January 31, 2020, this Court entered an initial Scheduling Order with deadlines set through the close of expert discovery on September 11, 2020. At the parties’ joint request, this Court on May 12, 2020 entered an Order modifying the case schedule by extending the existing

deadlines by eight weeks. On July 6, 2020, September 3, 2020, and November 13, 2020, the Court entered additional Orders modifying the case schedule by extending the existing deadlines by approximately eight weeks each time. On January 25, 2021, the Court entered another Order modifying the case schedule by extending the existing deadlines by approximately four weeks.

The parties now request a fifteen-day extension of the expert discovery deadline, and a one-week extension of the summary judgment deadlines below to give the parties sufficient time to complete expert depositions and prepare motions for summary judgment. The parties have been diligently working on completing expert discovery. Counsel for the parties have conferred about the effect of these circumstances upon the case's schedule. This is the sixth time the parties have sought an extension or modification to the case schedule.

IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, that the following deadlines are extended pursuant to the table below:

Event	Current Deadline	New Deadline
Expert discovery completed	Thursday, April 8, 2021	Friday, April 23, 2021
Opening summary judgment briefs	Thursday, April 29, 2021	Thursday, May 6, 2021
Summary judgment oppositions	Thursday, May 27, 2021	Friday, June 4, 2021
Summary judgment replies	Thursday, June 10, 2021	Thursday, June 17, 2021
Motions objecting to the reliability of an expert's proposed testimony under Rule 702 of the Federal Rules of Evidence	Thursday, June 17, 2021	Unchanged
Oppositions to motions objecting to the reliability of such experts' proposed	Thursday, July 8, 2021	Unchanged

testimony under Rule 702 of the Federal Rules of Evidence		
Replies in support of motions objecting to the reliability of such experts' proposed testimony under Rule 702 of the Federal Rules of Evidence	Thursday, July 22, 2021	Unchanged
Plaintiffs will initiate the pretrial order materials process to Defendants pursuant to the Court's Individual Practices	Thursday, June 17, 2021	Unchanged
Parties' submission of a pre-trial order in a form conforming with the Court's instructions together with trial briefs and either (1) proposed findings of fact and conclusions of law for a non-jury-trial; or (2) proposed voir dire questions and proposed jury instructions for a jury trial	Thursday, August 19, 2021	Unchanged
Final Pretrial Conference	Thursday, September 16, 2021, at 3 p.m.	Unchanged

Dated: March 24, 2021

Respectfully submitted,

/s/ Elizabeth E. Brenckman

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*Attorneys for Defendants David R. Goodfriend
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On this 25th day of March, 2021,

Approved By:

Louis L. Stanton
The Honorable Louis L. Stanton
United States District Judge

/s/ Thomas G. Hentoff

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